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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

SAVED MAGAZINE, an Idaho limited liability
company, AFSHIN YAGHTIN and MARY FELL
YAGHTIN, and the marital community thereof,

Plaintiffs

vs.

CITY OF SPOKANE, a municipal corporation in and
for the State of Washington, d/b/a;
SPOKANE PUBLIC LIBRARY,
SPOKANE POLICE DEPARTMENT;
CRAIG MEIDL, in his official and personal capacity;
KEVIN VAUGHN and JANE DOE VAUGHN, and
the marital community thereof;

Defendants.

Case No.

**VERIFIED COMPLAINT FOR
DECLARATORY
RELIEF, INJUNCTIVE RELIEF AND
DAMAGES**

Unlimited Civil Case
JURY TRIAL DEMANDED

ASSIGNED FOR ALL PURPOSES
TO JUDGE:
DEPARTMENT:
COMPLAINT FILED:
TRIAL DATE: tbd

Come now Plaintiffs, SAVED MAGAZINE (hereinafter "SAVED") and AFSHIN
YAGHTIN (hereinafter "YAGHTIN"), and MARY FELL YAGHTIN, and allege as follows:

INTRODUCTION

1
2 1. This action challenges restrictions on the freedom of press of a publication and
3 journalist by the CITY OF SPOKANE. A journalist, wearing a press pass, covering a story on the
4 Drag Queen Story Hour (“DQSH”) at a public library was threatened with arrest if he conducted
5 interviews. As a result of the intentional interference by police officers acting on behalf of the
6 CITY OF SPOKANE, the journalist and the magazine’s rights under the U.S. Constitution’s First
7 Amendment and the Washington Constitution were violated. Therefore, Plaintiffs bring this action
8 seeking redress in the courts.
9

PARTIES

10
11 2. Plaintiff Saved Magazine is a business entity incorporated in the State of Idaho.
12 Saved Magazine is an investigative Christian print periodical funded by paid subscriptions.

13 3. Plaintiff Afshin Yaghtin is the chief editor of Saved Magazine. Among his duties as
14 chief editor, Mr. Yaghtin contributes stories as a journalist, covers events, and assigns press passes.

15 4. All actions of Afshin Yaghtin upon information and belief were for the benefit of
16 Afshin and his marital community.
17

18 5. Defendant Craig Miedl was, at all times relevant to this action, a law enforcement
19 officer employed by the City of Spokane as the Chief of the Spokane Police Department.

20 6. At all times relevant to this action, Defendant Meidl was a person acting under color
21 of state or local law.
22

23 7. Defendant Meidl is sued in his official capacity.

24 8. Defendant Kevin Vaughn was, at all times relevant to this action, a law enforcement
25 officer, employed by the City of Spokane as a Sergeant for the Spokane Police Department

26 9. At all times relevant to this action, Defendant Vaughn was a person acting under the
27 color of state or local law.
28

1 of the press. Mr. Yaghtin was led to the entrance of the library. Officer Vaughn and Mr. Yaghtin
2 entered the library and stopped just inside the entry doors.

3 26. Officer Vaughn is then recorded stating, *"So here's the deal. You can move freely.
4 Alright? Once you start engaging people and if you cause a problem or anything like that you're
5 subject to arrest. Plain and simple. If you want to act as the press and report on it, you can do that.
6 Until you start engaging with people and there's problems, we will deal with it then and you'll be
7 subject to arrest."*

8
9 27. Police logs state at 12:51:16: "L266 to all units, subj that was arrested last time is on
10 scene with a press pass will be allowed to move freely throughout the event on both sides, until he
11 starts causing problems. He's been warned if he does cause problems, he will be under arrest."

12 28. Mr. Yaghtin returned to the sidewalk to interview counter protestors, but was closely
13 followed by police officers and not allowed to respond to their comments or interview them
14 himself. Police officers interrupted and halted Mr. Yaghtin's conversation with counter protestors
15 to ensure the content of their conversation was kept under the police officers' confines. With the
16 constant threats from the CITY OF SPOKANE police officers, Mr. Yaghtin was prohibited from
17 conducting interviews at the Drag Queen Story Hour so he could write a piece for Saved Magazine.
18

19 29. Plaintiffs, through counsel, wrote a letter to Spokane Police Chief Craig Meidl dated
20 June 27, 2019. The letter sought confirmation on whether Officer Vaughn's quoted statement
21 represented "the practices, policies, and official position of the Spokane Police Department" and, if
22 not, to indicate the steps they would take to train the policer officers and staff to ensure this would
23 not happen again. A true and correct copy of the letter accompanies this Complaint, is incorporated
24 in full, and marked as Exhibit 2.
25

26 30. Plaintiffs' counsel received a letter in response from Assistant City Attorney Mary
27 Muramatsu ("Muramatsu"). On July 3, 2019, Ms. Muramatsu stated, among other things, "If you
28

1 are aware of any facts that show the police prevented Mr. Yaghtin from exercising his fundamental
2 right to speak or to engage in journalism on June 22, 2019, please provide those along with any
3 supportive evidence, including the basis for which corrective action should be taken.” A true and
4 correct copy of the Assistant City Attorney’s letter accompanies this Complaint, is incorporated in
5 full, and marked as Exhibit 3.

6 31. On July 11, 2019, Plaintiffs, through counsel, e-mailed Ms. Muramatsu with a link to
7 two videos that recorded Officer Vaughn’s admonishing Mr. Yaghtin and video evidence of the Mr.
8 Yaghtin’s inability to conduct interviews with the counter protestors. The e-mail reiterated the
9 request for the official position of the Spokane Police Department and added: “These videos
10 demonstrate that [Mr. Yaghtin] was intimidated, threatened and not allowed to engage individuals
11 in his capacity as a member of the press. He had the right to engage and would have if he was not
12 unlawfully threatened. He was forced to walk through quietly and only allowed to speak if he was
13 asked a question. When he did speak in response, he was bullied by the police into complying with
14 their parameters on his speech against his will.” A true and correct copy of the July 11, 2019, e-
15 mail accompanies this Complaint, is incorporated in full, and marked as Exhibit 4.
16

17 32. On July 19, 2019, Ms. Muramatsu acknowledged receipt of the videos and requested
18 input on policy revisions and updated training via e-mail. A true and correct copy of Ms.
19 Muramatsu’s e-mail of July 19, 2019, accompanies this Complaint, is incorporated in full, and
20 marked as Exhibit 5
21

22 33. On Monday, July 22, 2019, Plaintiffs, through counsel, via email responded to Ms.
23 Muramatsu and reiterated that an official position from the Spokane Police Department was being
24 sought. No policy or training requests were made or discussed. A true and correct copy of the e-
25 mail of July 22, 2019, accompanies this Complaint, is incorporated in full, and marked as Exhibit 6.
26
27
28

1 34. On Friday, July 26, 2019, Ms. Muramatsu responded via e-mail with no official
2 position on the treatment of Mr. Yaghtin by the Spokane Police Department, specifically Officer
3 Vaughn. She once again asked for additional analysis or recommendations. She ended her email
4 with "this concludes our response." A true and correct copy of Ms. Muramatsu's e-mail of July 26,
5 2019, accompanies this Complaint, is incorporated in full, and marked as Exhibit 7
6

7 **FIRST CAUSE OF ACTION**

8 **Violation of the First Amendment to the United States Constitution**
9 **Freedom of the Press**
10 **(42 U.S.C. Section 1983)**

11 35. Plaintiff re-alleges and incorporates herein by this reference the preceding
12 paragraphs of this Complaint as though fully set forth herein.

13 36. The First Amendment to the United States Constitution prohibits state actors from
14 abridging the freedom of the press. The First Amendment is made applicable to the states through
15 the Fourteenth Amendment.

16 37. Defendant's decision to severely restrict the Plaintiffs' rights to freedom of the press
17 violates the First Amendment.
18

19 38. The actions, policies and practices of Defendant was done under color of state law.
20

21 39. Plaintiffs are informed and believe and thereon allege that the action of the Spokane
22 police officers were done pursuant to policies and practices of the CITY OF SPOKANE.
23

24 40. 42 U.S.C. Section 1983 authorizes suits against governmental actors who violate
25 constitutional provisions such as the First and Fourteenth Amendments.
26

27 41. Mr. YAGHTIN was exercising his rights to freedom of press by seeking to interview
28 persons at the DQSH event when he entered the grounds of the CITY's library property and

1 adjoining sidewalk to interview attendees. Likewise, Saved Magazine was exercising its rights to
2 freedom of the press by sending its journalist to cover the DQSH event.

3 42. Plaintiffs are informed and believe and thereon allege that there will continue to be
4 Drag Queen events within the jurisdiction of the CITY OF SPOKANE, as well as other
5 controversial and newsworthy events. As such, pursuant to his duties as a journalist and editor, Mr.
6 YAGHTIN intends to continue to appear at such events in the future in which he will interview
7 individuals present and write pieces for Saved Magazine. In the future, Saved Magazine will send
8 Mr. YAGHTIN or other journalists, whether employed or independent contractors of the periodical,
9 to cover Drag Queen and other controversial and newsworthy events within the jurisdiction of the
10 CITY OF SPOKANE. These journalists will conduct interviews, take photographs, make audio and
11 video recordings, and otherwise gather information in order to print articles that will appear in its
12 quarterly periodical.
13
14

15 43. The right to freely interview and interact with the public is an embedded aspect of
16 the fundamental right of press.
17

18 44. The CITY's library is a premier gathering place for citizens of Spokane, Washington
19 to enjoy cultural diversity, education, and entertainment.
20

21 45. The CITY has represented in court that the library in question is a public forum as
22 that term has come to be understood in First Amendment jurisprudence.
23

24 46. The policies and practices of the CITY OF SPOKANE, by and through police
25 officers employed by the CITY, or whose conduct is ratified by the CITY, has interfered, and will
26 continue to interfere with the rights to freedom of the press of the Plaintiffs unless enjoined by this
27 Court.
28

1 47. Plaintiffs seek to recover compensatory, actual, and special damages.

2 48. Plaintiffs seek a declaration that the Defendants violated their First and Fourteenth
3 Amendment freedoms.

4 49. Plaintiffs seek preliminary and permanent injunctive relief against further
5 abridgment of their First Amendment freedoms as made applicable to the Defendant through the
6 Fourteenth Amendment.
7

8 50. Further, there is a controversy between Plaintiffs and Defendants as to whether
9 preventing a journalist, in this instance Mr. YAGHTIN, from conducting interviews in his capacity
10 as a journalist is consistent with the rights secured under the First Amendment.
11

12 51. Plaintiffs are entitled to recover his reasonable costs of suit and attorneys' fees.
13

14 **SECOND CAUSE OF ACTION**
15 **Violation of the Washington Constitution, Article I, § 5**

16 52. Plaintiffs reallege and reincorporate all prior allegations in the preceding paragraphs
17 as though fully set forth herein.
18

19 53. The Washington Constitution, in Article I, § 5 guarantees to every person the liberty
20 to speak, write and publish his or her sentiments on all subjects, being responsible for the abuse of
21 that right. Neither a law nor any individual tasked with enforcing the law may restrain or abridge
22 liberty of speech or of the press.
23

24 54. Article I, § 5 has been interpreted more broadly than the First Amendment.

25 55. The CITY's library and sidewalks are a public forum as that term has been defined
26 by the state and federal courts.
27
28

1 56. Plaintiff Saved Magazine, through its agent journalist, Plaintiff Mr. YAGHTIN,
2 were deprived of the liberty to hear, speak, write, and publish its sentiments upon the grounds of the
3 CITY's library.

4 57. Mr. YAGHTIN was further deprived of his Article I, § 5 liberty to speak on the
5 public sidewalks outside the gates of the CITY's library.
6

7 58. The actions of the CITY OF SPOKANE are a prior restraint on speech and, by
8 extension, of the press.
9

10 59. The Guidelines, or lack thereof, promulgated by the CITY to limit expression are
11 inconsistent with Article I, § 5.
12

13 60. Plaintiffs have suffered actual, compensatory, and special damages in an amount
14 according to proof.

15 61. Plaintiffs seek a declaration that the CITY's Guidelines, or lack thereof, both on
16 their face and as applied to him, violate Article I, § 5 of the Washington Constitution.
17

18 62. Plaintiffs seek preliminary and permanent injunctive relief against enforcement of
19 the Guidelines or similar restrictions on his expression at the CITY's library.
20

21 63. Plaintiffs are entitled to recover their reasonable costs of suit and attorneys' fees.
22

23 **PRAYER FOR RELIEF**

24 WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:


- 25 1. A declaration that Defendants has violated the First and Fourteenth Amendments to the
26 United States Constitution;
27 2. A declaration that Defendant has violated Article I, § 5 of the Washington Constitution;
28

3. A preliminary injunction prohibiting Defendant from enforcing their Guidelines against Plaintiffs;
4. A permanent injunction prohibiting Defendant from enforcing its Guidelines against Plaintiffs;
5. General, nominal, and special damages against Defendants according to proof;
6. Attorneys' fees;
7. Costs of suit; and
8. Other relief the court deems just including leave to amend the complaint to add parties and causes of action.

DEMAND FOR JURY TRIAL

Plaintiffs demand a jury trial on all causes of action and claims to which they have a right to a jury trial.

DATED: January 14, 2019



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E-mails: jramos@pji.org

RICHARD LEE (WSBA # 32329)
P.O. Box 7550
Spokane, WA 99207
Telephone: (509) 536-0986
E-mail: Lawyerattorney@comcast.net

Attorneys for Plaintiffs, Saved Magazine &
Afshin Yaghtin

1 STATE OF WASHINGTON)
2) ss.
3 COUNTY OF SPOKANE)

VERIFICATION


AFSHIN YAGHTIN, on oath, says:

4 I am Afshin Yaghtin, chief editor of Saved Magazine, the plaintiffs in the above-
5 entitled action. I have read the foregoing verified complaint, know its contents, and believe the
6 same to be true.

7 
Afshin Yaghtin, Chief Editor

8
9 SUBSCRIBED AND SWORN to and before me on 9th day of January, 2020

10
11 **Notary Public**
12 **State of Washington**
13 **KARA M CALDWELL**
14 **COMM. # 207273**
15 **MY COMMISSION EXPIRES**
16 **MARCH 22, 2023**

17  03/22/23
18 NOTARY PUBLIC in and for the State of
19 Washington, residing at Cheney
20 Spokane, County

1 STATE OF WASHINGTON) VERIFICATION
2) ss.
3 COUNTY OF SPOKANE)


4 MARY FELL YAGHTIN, on oath, says:

5 I am Mary Fell Yaghtin the plaintiff in the above-entitled action. I have read the
6 foregoing verified complaint, know its contents, and believe the same to be true.

7 
Mary Fell Yaghtin,

8 SUBSCRIBED AND SWORN to and before me on 9th day of January, 2020

10 **Notary Public**
11 **State of Washington**
12 **KARA M CALDWELL**
13 **COMM. # 207273**
14 **MY COMMISSION EXPIRES**
15 **MARCH 22, 2023**

16  03/22/23
17 NOTARY PUBLIC in and for the State of
18 Washington, residing at Cheney
19 My commission expires 03/22/23

20 My commission expires 03/22/23
21 Spokane County
22
23
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EXHIBIT 1

06/22/2019 : 15:55:39 tpouncey Narrative: hie to all units outside come inside for the debrief asap
06/22/2019 : 15:32:09 tpouncey Narrative: event is now over inside the library
06/22/2019 : 15:22:41 tpouncey Narrative: should be finishing up in the next 10 mins
06/22/2019 : 14:13:38 tpouncey Narrative: L266 to tac3/tac4 arrest that guy in the roadway
06/22/2019 : 14:13:29 spokanecity\dooverhoff Narrative: About 700 people so far from both sides and inside the target reading room. Several fake press people present (independant) maybe be infiltrating the reading
06/22/2019 : 12:51:16 bbrown Narrative: L266 to all units, subj that was arrested last time is on scene with a press pass, will be allowed to move freely throughout the event on both sides, until he starts causing problems. He's been warned if he does cause problems, he will be under arrest.
06/22/2019 : 12:38:57 bbrown Narrative: Remote CFS# 2019040891 Created by [Infor]
06/22/2019 : 12:38:57 system Narrative: Created call 2019040891 [Infor]
06/22/2019 : 12:38:53 system Narrative: Call transfer initiated to Infor
06/22/2019 : 12:38:33 bbrown Narrative: medics to 900 w main, north side of the street to check on female that fell down, back pain.
06/22/2019 : 11:38:34 tpouncey Narrative: tac1 completed a secondary search of the main floor
06/22/2019 : 09:49:30 tpouncey Narrative: BREAK ROOM-NW CORNER LIBRARY BOTTOM FLOOR. PIZZA AT NOON---TAC 3 ONLY
06/22/2019 : 09:23:39 tpouncey Narrative: TAC1-PERIMETER HAS BEEN SWEEPED
06/22/2019 : 09:19:25 tpouncey Narrative: TAC3-2ND FLOOR CLEAR
06/22/2019 : 09:19:05 tpouncey Narrative: TAC2-FIRST FLOOR CLEAR
06/22/2019 : 09:17:05 tpouncey Narrative: tac4-3rd floor is clear
06/22/2019 : 08:50:27 tpouncey Narrative: OMBUDSMAN AND IA FOR ANY COMPLAINTS.
06/22/2019 : 08:29:47 tpouncey Narrative: CHANGE OF RADIO PLANS. TAC TEAM WILL BE OPERATING ON LOPS14
06/22/2019 : 08:01:19 tpouncey Narrative: DIG WILL BE ON LOPS 13 THIS AFTERNOON
06/22/2019 : 08:01:11 tpouncey Narrative: TAC TEAM ON LOPS 12
06/22/2019 : 08:01:02 tpouncey Narrative: LIBRARY READING

06/22/2019 : 08:51:30 tnoliver Narrative: l201 advd that per l149, call can be canx'd

06/22/2019 : 08:00:01 rbotner Narrative: cr242

06/22/2019 : 07:59:56 rbotner Narrative: comp read about minister being arrested outside spokane public library, wants to report LE arresting him as a crime, demanding contact today about situation, comp currently in Arizona.

06/22/2019 : 08:52:49 tpouncey Narrative: THEY WERE ADV THEY ARE GOING TO BE NEAR NORDSTROMS

06/22/2019 : 08:52:40 tpouncey Narrative: THIS PROTEST IS AGAINST THE READING.

06/22/2019 : 08:48:00 ktobler Narrative: cr333

06/22/2019 : 08:47:53 ktobler Narrative: comp is organizing protest at the library, wanting to know where it is ok for the protestors to be. comp req
tc from LE

EXHIBIT 2



PACIFIC JUSTICE
INSTITUTE

SACRAMENTO, CA SALEM, OR SAN FRANCISCO, CA SAN JOSE, CA SANTA ANA, CA SEATTLE, WA

June 27, 2019

SENT VIA EMAIL AND U.S. MAIL

Police Chief Craig Meidl
Spokane Police Department
1100 W Mallon Ave
Spokane, WA 99260
spdwebmail@spokanepolice.org
cmeidl@spokanepolice.org

**Re: Unconstitutional Treatment of Press at Drag Queen Story Hour –
Downtown Spokane Library on 06/22/2019**

Chief Meidl:

This office represents Afshin Yaghtin in the above referenced matter. It has come to our attention that the Spokane Police Department infringed upon Mr. Yaghtin's freedom of press rights at the downtown Spokane Public Library on June 22, 2019. Officer K. Vaugh viewed and acknowledged Mr. Yaghtin's press badge and went on to state on camera to Mr. Yaghtin:

"So here's the deal. You can move freely. Alright? Once you start engaging people and if you cause a problem or anything like that you're subject to arrest. Plain and simple. If you want to act as the press and report on it you can do that. Until you start engaging with people and there's problems, we will deal with it then and you'll be subject to arrest."

This is a clear violation of Washington State Constitution, Article I, Section 5. Engaging opposite viewpoints is the bedrock of journalism. Spokane Police Department acted wrongfully when it infringed on Mr. Yaghtin's fundamental right.

Mr. Yaghtin intends to attend similar events as the press in the future. Do the views of Officer K. Vaugh represent the practices, policies, and official position of the Spokane Police Department? If not, please indicate what steps you will be taking to train your police officers and staff to ensure this does not happen again.

We are optimistic that we can avoid litigation. Nevertheless, we seek a response by July 11, 2019, on Spokane Police Department's position.

Sincerely,

Jorge Ramos,
Staff Attorney
Pacific Justice Institute

PO Box 48011
Seattle, WA 98148
206 257-3239
jramos@pji.org

EXHIBIT 3

PAT J. DALTON

SENIOR ASSISTANT CITY ATTORNEY

ASSISTANT CITY ATTORNEYS

SALVATORE J. FAGGIANO

NATHANIEL J. ODLE

MATTHEW M. FOLSOM

MICHAEL J. PICCOLO

MARGARET HARRINGTON

JAMES A. RICHMAN

MARY F. MURAMATSU

ELIZABETH L. SCHOEDEL

MARIMAR I. ODLE

TIMOTHY E. SZAMBEAN



OFFICE OF THE CITY ATTORNEY

808 W. SPOKANE FALLS BLVD.

SPOKANE, WASHINGTON 99201-3326

509.625.6225

509.625.6277 FAX

MICHAEL C. ORMSBY

CITY ATTORNEY

July 3, 2019

Jorge Ramos, Staff Attorney

Pacific Justice Institute

PO Box 48011

Seattle, WA 98148

jramos@pij.org

Dear Mr. Ramos,

This office represents the Spokane Police Department and Chief Craig Meidl. We are in receipt of your letter to Chief Meidl dated June 27, 2019 alleging the Spokane Police Department infringed on the rights of Afshin Yaghtin on June 22, 2019. Your correspondence alleges constitutional violations and sets a deadline for a response concerning whether "the views" of a particular police officer represent "the practices, policies, and official position" of the police department and to state what corrective action will be taken.

Because you have raised the possibility of litigation against the Spokane Police Department, we would ask that you please cease all communications with Chief Meidl and direct all correspondence concerning this matter to this office.

If you are aware of any facts that show the police prevented Mr. Yaghtin from exercising his fundamental right to speak or to engage in journalism on June 22, 2019, please provide those along with any supportive evidence, including the basis for which corrective action should be taken. It is our goal to work with your office to find a successful resolution to this matter, including clearing up any misperceptions that may have occurred surrounding this incident.

Do not hesitate to contact me should you have any questions.

Sincerely,

Mary Muramatsu

Assistant City Attorney

cc: Police Chief Craig Meidl

EXHIBIT 4



Jorge Ramos <jramos@pji.org>

Afshin Yagtin - July 3, 2019 letter Response

Jorge Ramos <jramos@pji.org>

Thu, Jul 11, 2019 at 9:28 AM

To: mmuramatsu@spokanecity.org

Bcc: "ApplesofGold. com - Afshin" <afshin@applesofgold.com>

<https://1drv.ms/v/s!AuoUxzofnZW7mzrp4kUtEwvkCok7> **Saved-June 22.mpg**

Dear Ms. Muramatsu,

Thank you for your letter dated July 3, 2019. I have made multiple calls to your office. I would like to share the video file mentioned in my letter dated June 27, 2019. I have shared two links that should give you access to the video. Unless I hear otherwise, I will assume you were able to view the video.

In light of the video, I would repeat my question and request:

Do the views of Officer K. Vaugh represent the practices, policies, and official position of the Spokane Police Department? If not, please indicate what steps you will be taking to train your police officers and staff to ensure this does not happen again.

I'd request a response by July 19th, 2019. Thank you in advance for your attention to this matter.

Jorge A. Ramos, Staff Attorney
Pacific Justice Institute
www.pji.org

PO Box 48011
Seattle, WA 98148
(206) 257-3239

"Jesus Christ is the same yesterday and today and forever." Hebrews 13:8

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Jorge Ramos <jramos@pji.org>

Afshin Yagtin - July 3, 2019 letter Response

Jorge Ramos <jramos@pji.org>
To: mmuramatsu@spokanecity.org

Thu, Jul 11, 2019 at 1:57 PM

Ms. Marumatsu,

I am providing an additional video: <https://www.youtube.com/watch?v=u9K5tc4Rdw0>

These videos demonstrate that my client was intimidated, threatened and not allowed to engage individuals in his capacity as a member of the press. He had the right to engage and would have if he was not unlawfully threatened. He was forced to walk through quietly and only allowed to speak if he was asked a question. When he did speak in response, he was bullied by the police into complying with their parameters on his speech against his will.

This concludes our response to your requests in your letter. Thank you and we look forward to your response.

[Quoted text hidden]

EXHIBIT 5



Jorge Ramos <jramos@pji.org>

Afshin Yagtin - July 3, 2019 letter Response

Muramatsu, Mary <mmuramatsu@spokanecity.org>
To: Jorge Ramos <jramos@pji.org>

Fri, Jul 19, 2019 at 9:54 AM

Mr. Ramos,

Thank you for forwarding the videos. I've been out of the office and will need additional time to review these materials. That said, I appreciate your willingness to discuss your client's concerns. We are always looking to provide better training to the police department and to improve policies that will ensure public safety while protecting individual rights. As I indicated previously, I welcome your suggestions regarding potential policy revisions or updated training in this area.

Thank you again.

Best Regards,



Mary Muramatsu | City of Spokane | Office of the City Attorney | Assistant City Attorney

509.625.6289 | 509.951-0465 (cell) | mmuramatsu@spokanecity.org spokanecity.org

808 W. Spokane Falls Boulevard • Spokane, WA 99201



CONFIDENTIALITY NOTICE:

This e-mail, including any attachments, is confidential and may include privileged information. If you are not the intended recipient, or believe you have received this e-mail in error, please do not copy, print, forward, re-transmit, or otherwise disseminate this e-mail, its contents, or any of its attachments. Please delete this e-mail. Also, please notify the sender that you have received this e-mail in error. Thank you.

ADVISORY: Please be advised the City of Spokane is required to comply with the Public Records Act Chapter 42.56 RCW. This act establishes a strong state mandate in favor of disclosure of public records. As such, the information you submit to the City via email, including personal information, may ultimately be subject to disclosure as a public record.

From: Jorge Ramos <jramos@pji.org>
Sent: Thursday, July 11, 2019 1:57 PM
To: Muramatsu, Mary <mmuramatsu@spokanecity.org>
Subject: Re: Afshin Yagtin - July 3, 2019 letter Response

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Ms. Muramatsu,

I am providing an additional video: <https://www.youtube.com/watch?v=u9K5tc4Rdw0>

These videos demonstrate that my client was intimidated, threatened and not allowed to engage individuals in his capacity as a member of the press. He had the right to engage and would have if he was not unlawfully threatened. He was forced to walk through quietly and only allowed to speak if he was asked a question. When he did speak in response, he was bullied by the police into complying with their parameters on his speech against his will.

This concludes our response to your requests in your letter. Thank you and we look forward to your response.

On Thu, Jul 11, 2019 at 9:28 AM Jorge Ramos <jramos@pji.org> wrote:

<https://1drv.ms/v/s!AuoUxzofnZW7mzrp4kUtEwvkCok7>

Dear Ms. Muramatsu,

Saved-June 22.mpgError! Filename not specified.

Thank you for your letter dated July 3, 2019. I have made multiple calls to your office. I would like to share the video file mentioned in my letter dated June 27, 2019. I have shared two links that should give you access to the video. Unless I hear otherwise, I will assume you were able to view the video.

In light of the video, I would repeat my question and request:

Do the views of Officer K. Vaugh represent the practices, policies, and official position of the Spokane Police Department? If not, please indicate what steps you will be taking to train your police officers and staff to ensure this does not happen again.

I'd request a response by July 19th, 2019. Thank you in advance for your attention to this matter.

Jorge A. Ramos, Staff Attorney

Pacific Justice Institute

www.pji.org

PO Box 48011

Seattle, WA 98148

(206) 257-3239

"Jesus Christ is the same yesterday and today and forever." Hebrews 13:8

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EXHIBIT 6



Jorge Ramos <jramos@pji.org>

Afshin Yagtin - July 3, 2019 letter Response

Jorge Ramos <jramos@pji.org>

Mon, Jul 22, 2019 at 9:31 AM

To: "Muramatsu, Mary" <mmuramatsu@spokanecity.org>

Bcc: "ApplesofGold. com - Afshin" <afshin@applesofgold.com>

Ms. Muramatsu,

I was informed that you were out of town. Thank you for having someone from your office do that.

Again, in light of the **videos**, I would repeat my question and request:

Do the views of Officer K. Vaugh represent the practices, policies, and official position of the Spokane Police Department?
If not, please indicate what steps you will be taking to train your police officers and staff to ensure this does not happen again.

I'd request a response by July 31st, 2019. Thank you in advance for your attention to this matter.

[Quoted text hidden]

EXHIBIT 7



Jorge Ramos <jramos@pji.org>

Re: Afshin Yagtin - July 3, 2019 letter Response

Muramatsu, Mary <mmuramatsu@spokanecity.org>
To: Jorge Ramos <jramos@pji.org>

Fri, Jul 26, 2019 at 3:45 PM

Mr. Ramos,

Again, I want to thank you for forwarding the videos and for presenting your client's concerns. We will review and evaluate what you have submitted. As I previously indicated, we are always willing to entertain suggestions for improvement and to update our training to city employees.

In prior correspondences, I've encouraged you to provide your input regarding any actions you believe should be taken to address your client's concerns. Unless you have additional analysis or recommendations for us to consider, this concludes our response.

Regards,



Mary Muramatsu | City of Spokane | Office of the City Attorney | Assistant City Attorney

509.625.6289 | 509.951-0465 (cell) | mmuramatsu@spokanecity.org spokanecity.org

808 W. Spokane Falls Boulevard • Spokane, WA 99201



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